

## **REMARKS**

The Applicant respectfully requests further examination and reconsideration in view of the arguments set forth fully below. Claims 1-50 were previously pending in this application. Within the Office Action, claims 1-50 have been rejected. By the above amendment, claims 1, 4, 5, 7, 10, 11, 13, 16, 17, 19, 22, 23, 25, 28, 29, 31, 36, 37, 40, 41, 43, and 46 have been amended. Accordingly, claims 1-50 are currently pending in this application.

### **Rejections under 35 U.S.C. §102**

Within the Office Action, claims 1-50 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,253,188 issued to Witek et al. (hereafter “Witek”). The Applicant respectfully traverses this rejection for the following reasons.

Witek teaches a system and method for providing classified ads over the Internet. Internet users can connect to a Newspaper web server and central Web application server to search for and obtain classified ads. Ad records are stored in ad database servers 20 for providing classified ad records on request to application servers 16. To search the ad records, the search process is divided into two principle parts. The first part includes a system entry and pre-selection sequence, and the second part includes a record selection sequence (Witek, col. 12, lines 10-13). More specifically, in the first part the user enters the system and specifies the category of classified ads to be searched. Thereafter, as the user navigates to the respective selected category, the user further specifies a subcategory for the particular category selected (Witek, col. 12, lines 27-37). The selected category and subcategory pair is identified by a category/subcategory ID 46. Figure 4 illustrates a two-level tree structure including a category level 78 and a subcategory level 80. A level 82 is also illustrated which represents selection of primary and secondary selection parameters. However, this is nothing more than a selection option, such as menu 140 in Figure 10, which is associated with the specific subcategory selected in level 80. Users can navigate between a category and a subcategory, and from the subcategory back to the category. This is simplistically referred to as vertical movement up and down the tree structure. Witek does not teach a means for laterally, or horizontally, moving within the tree structure.

The directory tree structure of the present invention is an overlay to a searchable data base. One type of pointer, a data pointer, links positions within the directory tree structure to individual data items. Each node within the directory tree structure includes one or more data

pointers. Since each node is related to a specific category, all data items linked to the node are also related to the specific category. Each node includes a set of parameter fields, and each individual data item linked to the node has a set value for one or more of the parameter fields. In this manner, each individual data item is characterized by a navigation path through the directory tree structure to a node linked to the individual data item, and by its set parameter field values. Accordingly, the data pointer that links the node to the individual data item is also characterized by the navigation path to the node and the set parameter field values of the individual data item.

Nodes are also preferably cross-linked to other nodes with related topics. Objects, such as individual data items or nodes, are linked to multiple categories inside the directory tree structure. Cross-links between two nodes, or node pointers, enable users to navigate laterally around the directory tree structure. Cross-links are different than links, or branches, between a parent node and a child node. Branches are links within the same navigation path. Cross-links are links between two nodes located in different navigation paths. Witek teaches a directory path from a category to a subcategory of the category. This is most analogous to a branch within the present invention. However, Witek does not teach cross-links, that is node pointers directed from a node in a first navigation path to another node in a different navigation path than the first navigation path.

Amended independent claim 1 is directed to a method of organizing data within a searchable database. The method of claim 1 comprises the steps of generating a directory tree structure, wherein the directory tree structure includes nodes comprising a designated category for each node and branches comprising links between the nodes, generating one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node, and generating one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths. As discussed above, Witek does not teach node pointers directed from a node

in a first navigation path to another node in a different navigation path than the first navigation path. For at least these reasons, the independent claim 1 is allowable over the teachings of Witek.

Claims 2-12 depend on the independent claim 1. As described above, the independent claim 1 is allowable over the teachings of Witek. Accordingly, claims 2-12 are all also allowable as being dependent on an allowable base claim.

Amended independent claim 13 is directed to an organization system for organizing data within a searchable database. The organization system of claim 13 comprises means for generating a directory tree structure, wherein the directory tree structure includes nodes comprising a designated category for each node and branches comprising links between the nodes, means for generating one or more data pointers coupled to the means for generating a directory tree structure, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node, and means for generating one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths. As discussed above, Witek does not teach node pointers directed from a node in a first navigation path to another node in a different navigation path than the first navigation path. For at least these reasons, the independent claim 13 is allowable over the teachings of Witek.

Claims 14-24 depend on the independent claim 13. As described above, the independent claim 13 is allowable over the teachings of Witek. Accordingly, claims 14-24 are all also allowable as being dependent on an allowable base claim.

Amended independent claim 25 is directed to an organization system for organizing data within a searchable database. The organization system of claim 25 comprises an organization server configured to generate a directory tree structure, wherein the directory tree structure includes nodes comprising a designated category for each node and branches comprising links

between the nodes, and to generate one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node and to generate one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure, and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths. As discussed above, Witek does not teach node pointers directed from a node in a first navigation path to another node in a different navigation path than the first navigation path. For at least these reasons, the independent claim 25 is allowable over the teachings of Witek.

Claims 26-36 depend on the independent claim 25. As described above, the independent claim 25 is allowable over the teachings of Witek. Accordingly, claims 26-36 are all also allowable as being dependent on an allowable base claim.

Amended independent claim 37 is directed to a network of devices for organizing data within a searchable database. The network of devices of claim 37 comprises one or more computer systems configured to communicate with other systems, and an organization server configured to couple to the one or more computer systems to generate a directory tree structure, wherein the directory tree structure includes nodes comprising a designated category for each node and branches comprising links between the nodes, and to generate one or more data pointers, wherein each data pointer corresponds to a specific node and the data pointer links the specific node to an item of data within the searchable database, wherein each data pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual data item thereby forming a set parameter, and the parameters are specific to the node in which the data pointer is included, further wherein all items of data linked to the specific node by the corresponding data pointers of the specific node are related to the designated category of the specific node and to generate one or more node pointers, wherein a first node pointer corresponds to a first node located in a first navigation path through the directory tree structure,

and the first node pointer is directed to a second node located in a second navigation path different than the first navigation path, thereby forming a cross-link between two nodes located in two different navigation paths. As discussed above, Witek does not teach node pointers directed from a node in a first navigation path to another node in a different navigation path than the first navigation path. For at least these reasons, the independent claim 37 is allowable over the teachings of Witek.

Claims 38-46 depend on the independent claim 37. As described above, the independent claim 37 is allowable over the teachings of Witek. Accordingly, claims 38-46 are all also allowable as being dependent on an allowable base claim.

Within the Office Action, it is stated that Witek teaches that each node within the directory tree structure includes a corresponding html address, as claimed in the present application. To support this assertion, column 23, lines 11-22 of Witek is cited. The Applicant respectfully disagrees with this interpretation of the cited passage. Column 23, lines 11-22 of Witek describes a user accessing a newspaper website. The user is to navigate the newspaper web site to locate the desired feature, that is the classified ad system. The Applicant agrees that navigating a web site that includes html pages and hyperlinks between the html pages is well known in the art. However, at column 23, lines 11-22, Witek teaches how to navigate the newspaper web site to access the classified ad system. This is not a description as to the classified ad system itself, nor a description of the category structure of the classified ad system previously described. In contrast, the present application claims the configuration of a system that organizes data into a directory tree structure, where nodes within the directory tree structure represent html addresses and the branches between nodes represent links from an html address of one node to an html address of another node. Most analogous to a node of the present invention is a category/subcategory designation of Witek. However, there is no hint, teaching, or suggestion within Witek that indicates a category/subcategory designation corresponds to an html address.

Claim 47 is directed to a method of organizing data within a searchable database. The method of claim 47 comprises generating a directory tree structure, wherein the directory tree structure includes nodes comprising a designated category and an html address for each node and branches comprising links between the nodes, and generating one or more pointers, wherein each pointer corresponds to a specific node and the pointer links the specific node to an item of web-based multimedia within the searchable database, wherein each pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each

parameter is set with a corresponding value associated with an individual web-based multimedia item thereby forming a set parameter, and the parameters are specific to the node in which the pointer is included, further wherein all items of web-based multimedia linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node. As discussed above, Witek does not teach a node corresponding to an html address. For at least these reasons, the independent claim 47 is allowable over the teachings of Witek.

Claim 48 depends on the independent claim 47. As described above, the independent claim 47 is allowable over the teachings of Witek. Accordingly, claim 48 is also allowable as being dependent on an allowable base claim.

Claim 49 is directed to a method of generating a directory tree structure for organizing data within a searchable database and for accessing the searchable database over the internet. The method of claim 49 comprises the steps of generating one or more nodes wherein each node includes an html address and a designated category, generating links between the nodes wherein each node is linked to at least one other node, further wherein each link is a hypertext link between a first html address of a first node and a second html address of a second node, generating one or more pointers, wherein each pointer corresponds to a specific node and the pointer links the specific node to an item of web-based multimedia within the searchable database, wherein each pointer is categorized by a navigation path through the directory tree structure and by one or more parameters, wherein each parameter is set with a corresponding value associated with an individual web-based multimedia item thereby forming a set parameter, and the parameters are specific to the node in which the pointer is included, further wherein all items of web-based multimedia linked to the specific node by the corresponding pointers of the specific node are related to the designated category of the specific node, and establishing a connection over the internet to the directory tree structure for accessing the searchable database. As discussed above, Witek does not teach a node corresponding to an html address. For at least these reasons, the independent claim 49 is allowable over the teachings of Witek.

Claim 50 depends on the independent claim 49. As described above, the independent claim 49 is allowable over the teachings of Witek. Accordingly, claim 50 is also allowable as being dependent on an allowable base claim.

For the reasons given above, Applicant respectfully submits that claims 1-50 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he/she is encouraged to call the undersigned attorney at (408) 530-9700.

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